

the chamber. There is no seal disposed about the open end of the vaporized etchant injector assembly disclosed in Ketchum. In Ketchum, the open end of the injector assembly is fitted with a diffusing screen 40 and suspended above floor 32. The Examiner asserts that Ketchum discloses a seal "located around element 40." This assertion is not correct. Element 40 is a diffusing screen. The only structure "located around element 40" appears to be a frame that supports diffusing screen 40. There is nothing in Ketchum that teaches or suggests that this part is anything other than a frame that supports diffusing screen 40, just like the frame around an ordinary window screen. This apparent frame/support structure is not mentioned in Ketchum and there is no reason to **assume** it is a seal. There is no need for a seal in Ketchum and none is disclosed. If the Examiner disagrees, she is respectfully requested to specifically point out those passages in Ketchum that teach or even suggest there is a seal around diffusing screen 40. Absent such a showing, the Section 102 rejection of Claims 15 and 21 should be withdrawn.

Claims 28, 29 and 32 require introducing a liquid etchant into the etch chamber. As the Examiner correctly notes in her remarks, Ketchum teaches injecting a vaporized etchant into a deposition reactor. Introducing a liquid etchant into the chamber is not the same as injecting a vaporized etchant. In fact, this is one of the primary novel features of the various embodiments of the invention. The use of a vaporized etchant such as that shown in Ketchum is specifically noted in the Background section of the Specification at page 3, lines 15-20. The claimed invention was developed to help overcome the disadvantages of the prior art vaporized etchant systems. Background, pages 2-3 and Summary, pages 3-4.

Ketchum clearly does not teach all of the limitations in Claims 28, 29 and 32 and, therefore, the Section 102 rejection of those claims should be withdrawn.

Claims 16, 22-23 and 30-31 also distinguish patentably over Ketchum due to their dependence on Claims 15, 21 and 30, respectively.

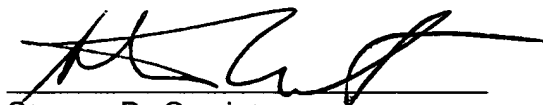
Rejections Under 35 U.S.C. § 103

Claims 17 and 18-20 were rejected under Section 103 as being obvious over

Ketchum in view of Bond (4,124,437). Ketchum is relied on for teaching all claim limitations except a window and a closed end. Claim 18 requires a chamber defining a liquid etchant inlet and a seal disposed about the open end of the chamber. Claim 17 depends from Claim 15. For the reasons noted above, Ketchum does not teach or suggest a chamber defining a liquid etchant inlet or a seal disposed about the open end of the chamber. For these same reasons, dependent Claim 17 and Claim 18 distinguish over Ketchum and Bond under Section 103. Claims 19-20 also distinguish over the cited references due to their dependence on Claim 18.

The application is in condition for allowance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Ormiston', written over a horizontal line.

Steven R. Ormiston
Attorney for Applicant
Registration No. 35,974
(208) 433-1991 x204